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Eric L. Olsen, LL.M elo@racinelaw.net

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UTILITIES COMMISSION

June 22, 2015

Jean J. Jewell, Secretary Idaho Public Utilities Commission P.O. Box 83720 Boise, Idaho 83720-0084

Re:

Case No. IPC-E-15-09

Dear Mrs. Jewell:

Enclosed for filing in the captioned case please find an original and nine copies of our Petition of Idaho Irrigation Pumpers Association, Inc. for Leave to Intervene and Idaho Irrigation Pumpers Association, Inc.'s First Data Request to PacifiCorp.

Thank you for your assistance.

Very truly yours,

ERIC L. OLSEN

ELO:tl

Enclosures c: Serv

Service List

Eric L. Olsen (ISB#: 4811) RACINE, OLSON, NYE, BUDGE & BAILEY, CHARTERED P.O. Box 1391 Pocatello, Idaho 83204-1391

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IDAHO PUSE S
UTILITIES COMMISSION

Attorneys for Intervenor Idaho Irrigation Pumpers Association, Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER TO MODIFY THE ENERGY COST ADJUSTMENT MECHANISM AND INCREASE REATES BY \$10.2 MILLION, OR APPROXIMATELY 3.9 PERCENT CASE NO. PAC-E-15-09

PETITION OF IDAHO IRRIGATION PUMPERS ASSOCIATION, INC. FOR LEAVE TO INTERVENE

COMES NOW Idaho Irrigation Pumpers Association, Inc., herein called "this Intervenor" and pursuant to Rules 71 through 73 of the rules of Procedure of the Idaho Public Utility

Commission, and by this Petition asks leave to intervene herein and to appear and participate as a party herein, and as basis therefor states as follows:

(1) The name and address of this Intervenor is:

Idaho Irrigation Pumpers Association, Inc. c/o Lynn Tominaga P.O. Box 2624 Boise, Idaho 83701-2624

This Intervenor will be represented by:

Eric L. Olsen Racine, Olson, Nye, Budge & Bailey, Chartered P.O. Box 1391; 201 E. Center Pocatello, Idaho 83204-1391 and requests that copies of all pleadings and production requests and responses should be provided to the following:

> Eric L. Olsen Racine, Olson, Nye, Budge & Bailey, Chartered P.O. Box 1391; 201 E. Center Pocatello, Idaho 83204-1391 Telephone: (208) 232-6101

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Anthony Yankel 29814 Lake Road Bay Village, Ohio 44140 Fax: 440-808-1450

E-mail: tony@yankel.net

- (2) This Intervenor and its members have a direct and substantial interest in this proceeding and intend to participate in all respects herein as a party as may be required to represent its interests.
- (3) Without the opportunity to intervene herein, this Intervenor would be without a manner or means of participating in the lawful determination of issues which will result in affecting its rates for electric service.

WHEREFORE, this Intervenor requests that this Commission confirm this Intervenor's leave to intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate; that the Commission order that a hearing be scheduled on this matter; and to allow this Intervenor to present evidence, call and examine witnesses, cross-examine witnesses, present argument, and to allow otherwise fully participate in the proceedings.

DATED this 22nd day of June, 2015.

RACINE, OLSON, NYE, BUDGE & BAILEY, CHARTER ERIC L. OLSEN **CERTIFICATE OF SERVICE** I HEREBY CERTIFY that on this 22 day of June, 2015 I served a true, correct and complete copy of the Petition of Idaho Irrigation Pumpers Association, Inc. for Leave to Intervene to each of the following, via U.S. Mail or private courier, e-mail or hand delivery, as indicated below: Jean D. Jewell, Secretary US Mail/Postage Prepaid Idaho Public Utilities Commission Email P.O. Box 83720 Facsimile 472 W. Washington Street Boise, Overnight Mail Idaho 83720-0074 Hand Delivered jjewell@puc.state.id.us Ted Weston US Mail/Postage Prepaid Rocky Mountain Power ✓ Email 201 South Main, Suite 23009 Salt Facsimile Lake City, Utah 84111 Overnight Mail ted.weston@pacificorp.com Hand Delivered US Mail/Postage Prepaid Yvonne R. Hogle, Senior Counsel Rocky Email Mountain Power Facsimile 201 South Main, Suite 2300 Salt Overnight Mail Lake City, Utah 84111 Hand Delivered yvonne.hogle@pacificorp.com US Mail/Postage Prepaid Ronald L. Williams Williams Email Bradbury PC 1015 W. Hays Facsimile Street Boise, ID 83702 Overnight Mail ron@williamsbradbury.com Hand Delivered

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Syn Sulu Eric L. Olsen